

Spears & Imes LLP  
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## MEMO ENDORSED

Hon. Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

March 19, 2023

**Re: *United States v. Stanislav Yakubov*, S1 22 Cr. 206 (ER)**

Dear Judge Ramos:

I respectfully write to request a modification of the terms of Mr. Yakubov's pre-sentence conditions of release for the limited purpose of allowing him to participate in transporting his children to and from school. Sentencing is currently scheduled for June 1, 2023. The Pretrial Services Officer who supervises Mr. Yakubov consents to this request. The Government opposes the request.

On February 1, 2023, Mr. Yakubov was convicted following trial of one count of participating in a conspiracy to commit money laundering, and two counts of making false statements to federal law enforcement officers. The Court imposed a pre-sentence condition of home detention on Mr. Yakubov, with exceptions for work, attending religious services, attending medical appointments, and attending meetings with counsel. The Court also imposed a condition that Mr. Yakubov provide security for his previously unsecured bond. Since the date that the Court imposed these conditions, Mr. Yakubov has abided by them without incident, and has given no indication of being a flight risk.

Mr. Yakubov and his wife have four children, each at a different stage of education. Their youngest child is in preschool, and their other children are in elementary school, middle school, and high school, respectively. The elementary school and the middle school are located in the same building. The preschool and the high school are each located in different buildings. The result of this is that the Yakubovs must drop off their children at three different locations for school each morning and pick them up from three different locations in the afternoon. The resulting practical burden on Mr. Yakubov's wife, who also works during the day, has been enormous.

On the day that the Court imposed the condition of home confinement on Mr. Yakubov, I made an oral request that there be an exception to allow him to transport his children to and from their various activities, which the Court denied. That request was admittedly general, and I now respectfully make a more narrow request, limited strictly to his children's school attendance, and in light of the struggle that it has been

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for Mr. Yakubov's family to ensure that his children arrive at school in a timely fashion during the week.

I thank the Court for its consideration of this request.

Respectfully submitted

*/s/Max Nicholas*  
Max Nicholas  
Spears & Imes LLP

Mr. Yakubov's application for a modification of his terms of release allowing him to transport his children to and from school is granted.  
SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Edgardo Ramos', is written over a horizontal line.

Edgardo Ramos, U.S.D.J.

Dated: 3/22/2023

New York, New York